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Attorneys for Non-Party Department of Justice  
7 Attorneys for Non-Party Department of Justice

8 UNITED STATES DISTRICT COURT  
9 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
10 WESTERN DIVISION

11 ROBERT HUNTER BIDEN,  
12 Plaintiff,  
13 v.  
14 PATRICK M. BYRNE,  
15 Defendants.  
16

Case No. 2:23-cv-9430-SVW-PD

**NON-PARTY DEPARTMENT OF  
JUSTICE'S REQUEST FOR COUNSEL  
TO APPEAR REMOTELY FOR  
MARCH 17, 2025 HEARING ON  
PLAINTIFF HUNTER BIDEN'S  
MOTION TO COMPEL COMPLIANCE  
WITH TOUHY REQUEST:  
DECLARATION OF SAMUEL BEAN**

[[*Proposed*]] Order filed and served  
concurrently herewith]

Hearing Date: March 17, 2025  
Hearing Time: 1:30 p.m.  
Ctrm: 10A  
Hon. Stephen V. Wilson

1 TO THE HONORABLE COURT, ALL PARTIES AND THEIR ATTORNEYS  
2 OF RECORD, Non-Party Department of Justice hereby respectfully requests permission  
3 from this Court for Counsel, Samuel Bean, to appear remotely by way of  
4 videoconference (e.g. Zoom) for the hearing on Plaintiff's Motion to Compel  
5 Compliance With Touhy Request scheduled in this case for March 17, 2025 at 1:30 p.m.  
6 (the "Hearing"). Good cause exists to grant this request because Mr. Bean is unable to  
7 be in the State of California on March 17, 2025, due to the fact that he resides in  
8 Washington, D.C. and has family/childcare obligations, that prevent him from traveling  
9 to California and attending the Hearing in person on that date. Accordingly, Non-Party  
10 Department of Justice respectfully requests that the Court grant this request for Mr. Bean  
11 to appear remotely by videoconference at the hearing.

12 Dated: March 10, 2025  
13

14 YAAKOV M. ROTH  
15 Acting Assistant Attorney General

16 JACQUELINE COLEMAN SNEAD  
17 Assistant Branch Director

18 /s/ Samuel Bean  
19 SAMUEL BEAN  
20 Trial Attorney

21 Attorney for Defendant  
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**DECLARATION OF SAMUEL BEAN**

I, Samuel Bean, declare and state as follows:

1. I am a trial attorney for the Department of Justice, Civil Division, Federal Programs Branch, assigned to handle the above-entitled matter and am over the age of 18. I hereby submit this declaration in support of Non-Party Department of Justice's Request for Counsel to Appear Remotely for the hearing on Plaintiff's Motion to Compel Compliance with the Touhy Request scheduled in this case for March 17, 2025 at 1:30 p.m. (the "Hearing"). If called as a witness, I would and could testify to the matters contained herein.

2. I have been involved in all aspects of this matter since my assignment on January 24, 2025 and my participation in the Hearing for the limited purpose of responding to the motion is, therefore, necessary.

3. I am unable to be in the State of California on March 17, 2025 because I reside in Washington, D.C. and have family/child-care obligations that week, including a family member's birthday party, that prevent me from traveling to California and attending the Hearing in person.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this 7<sup>th</sup> day of March, 2025, at Washington, D.C.

/s/ Samuel Bean

SAMUEL BEAN